

From: [HarborComments](#)
To: [PortlandHarbor](#)
Subject: Public Comment on proposed Explanation of Significant Differences to the Portland Harbor Superfund Site Cleanup Plan
Date: Monday, December 24, 2018 1:35:55 AM

From: (b) (6)
Sent: Friday, December 21, 2018 6:10 PM
To: HarborComments <HarborComments@epa.gov>
Subject: Public Comment on proposed Explanation of Significant Differences to the Portland Harbor Superfund Site Cleanup Plan

I am against the proposed changes to the Portland Harbor Superfund Site Cleanup Plan. The Willamette River is an important basis of our city, and I have grown up enjoying its presence and everything it offers, such as a cool swim after a hot day of biking, to a crucial source of sustenance to many residents. But one of the most important is the Willamette's ecological role, how it supports so many different animal and plant populations, environments, people, and cities. We can't keep taking it and its resources for granted, or using it as a wastewater tank, a toilet to wash "away" industrial pollution. The facts are that the majority of these chemicals don't break down, but settle into the sediments and contaminate habitats downstream and in the ocean where the Willamette's waters end up after travelling the Columbia River. We must eliminate this pollution every way we can, including by getting rid of the sources of pollution (not just giving businesses the okay to pollute through permit processes, especially if those permits can be bought in any way) and by cleaning up the contaminants already in the river.

While benzo[a]pyrene may be 7.3 times less carcinogenic, we cannot generalize that that is so for all PAHs. Other, more recent studies may even prove contrary. Whether they are or are not, they are still carcinogenic, and any cancer is too much cancer. The risks for heart disease, respiratory problems, reproductive issues, and other health issues have not been reevaluated as well, but are still present and dangerous. Any ill health that can be avoided should be, and we shouldn't be knowingly causing it much less. Moreover, the Environmental Protection Agency has not conducted any studies to examine whether the byproducts that PAHs break down into are any less toxic, which is especially dubious as there is great potential for them to be *more* toxic. There has also not been any analysis of the toxicity of benzo[a]pyrene, other PAHs, their byproducts, or combinations of them with other chemicals present in the harbor (such as dioxins, PCBs, metals, DDT, organic chemicals) or in combinations with other types of PAHs, which can be even more toxic. No analysis has been done as to whether any of this, or the proposed changes, would uphold water quality standards. Furthermore, wildlife was not taken into account - by the *Environmental Protection Agency* - and the studies on human health effects only looked at specific populations (e.g. only adult dock workers). Studies need to be done, and done comprehensively, taking into account all aspects and variations of the issues, before we risk the safety of more people and ecosystems. It doesn't hurt the river or anyone else to remove the poisons contaminating it, doing so would only help and is necessary for the river's health. Any changes should be to clean the river and protect people and wildlife more.

Instead, contaminants are left that hurt, in addition to the ecosystems and river itself, communities who historically have been taken advantage of and had to deal with the effects of things like this the most, namely Native American people and North Portland communities. These changes and Explanation of Significant Differences, strangely in the middle of a five year review cycle, allow Potentially Responsible Parties, companies like NW Naturals and Terminal 4 industries, to take less responsibility and more leeway to pollute, as well as

demand changes at the whim and leisure. \$35 million is not worth the health of our communities, environment, and the strength and integrity of the industrial regulations that protect them. The lack of studies and analysis done to research the safety of every aspect of the proposed changes shows that we do not know, nor can we claim to know, the full safety and potential consequences of our actions, of these changes. In the words of one of the EPA officials at the Portland community meetings, “we just don’t know a lot of things.” There is not enough information available, and a lot of what is shows huge amounts of risk, and that the proposed changes are not a good idea, for Portland, for our communities, for the environment, and in the long term likely not for the businesses themselves. No amount of community or environmental harm is a safe amount. As well, whether they like it or not, businesses and industry do rely on and are a part of the communities and environment, and must support them in order to survive and thrive.

But by going forward with the proposed changes that reduce the amount of PAHs cleaned, you claim that we do know all of the possible risk of the chemicals, that they will not cause that much harm, and that the people and ecosystems harmed by the changes - harmed through your and the potentially responsible parties support and pollution - are not worth the extra precaution or slight inconvenience to industries, which have much more power than they do.

I am also concerned that the methods used to take care of the PAHs in the Portland Harbor Superfund Site will not actually remediate the harm or keep from causing more harm. Dredging stirs up the toxins and disturbs wildlife on the river floor. Capping the contaminants does not actually do anything about them - they are still there, covering up a problem does not make it do away. Especially considering the probability for an earthquake in the region from the Cascadia Subduction Zone, such caps may not hold up, but allow chemicals to burst forth and re-contaminate the river. Until then, they may seep into surrounding land and groundwater, and the caps may prevent the normal growth, life, and habitats of that part of the river and land. Natural remediation, as well, may not be that much different from simply leaving the contaminants in the river and allowing whatever would happen to happen - whether it does lead to remediation or to continued presence of toxins.

I strongly urge you to reject the proposed changes / Explanation of Significant Differences, and stick to the Record of Decision decided in 2017 for the clean up of the Portland Harbor Superfund Site. If and when any changes are made, they must be to clean the Willamette River more, and to ensure that the methods used to do so are not harmful and truly do clean the contaminants.

In addition, it is important to increase the amount and strength of community outreach and input opportunities, beginning these opportunities earlier and having them more frequently. This is crucial for greater transparency, community (the ultimate stakeholders) understanding, influence, trust, and autonomy, which is needed going forward.

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